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9 Attorneys for Debtor and Debtor in Possession

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11 **UNITED STATES BANKRUPTCY COURT**
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13 **CENTRAL DISTRICT OF CALIFORNIA**
14
15 **LOS ANGELES DIVISION**

16 In re:

17 CRESTLLOYD, LLC,

18 Debtor and Debtor in Possession.

Case No.: 2:21-bk-18205-DS

Chapter 11 Case

**STIPULATION WITH AMERICAN
TRUCK & TOOL RENTALS INC. RE:
ALLOWANCE AND PAYMENT OF
CLAIM**

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21 This *Stipulation* (“Stipulation”) With American Truck & Tool Rentals Inc. (“American”)
22 *Re: Allowance and Payment of Claim* is entered into by and between Crestlloyd, LLC, the Chapter
23 11 debtor and debtor in possession herein (the “Debtor”), and American, with respect to the
24 following:

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RECITALS

A. On October 26, 2021, the Debtor commenced this bankruptcy case by filing a voluntary petition under Chapter 11 of the Bankruptcy Code.

B. On November 23, 2021, the Debtor filed its Schedules of Assets and Liabilities, which listed, inter alia, the Debtor's primary asset, a piece of real property located at 944 Airole Way, Los Angeles, CA 90077 (the "Property").

C. On January 13, 2022, American filed its proof of claims, designated as Claim No. 14 (the "Claim") asserting a mechanic's lien with respect to the Property in the amount of \$188,087.09.

D. In an effort to further judicial economy and efforts to resolve any purported issues with respect to the Claim and to avoid the need for the parties to incur attorneys' fees in connection with litigation and to effectuate prompt distribution of funds, the parties desire to stipulate as set forth below.

STIPULATION

NOW, THEREFORE, BASED ON THE FOREGOING RECITALS OF FACT, WHICH ARE INCORPORATED INTO THE AGREEMENT BELOW, THE DEBTOR AND AMERICAN HEREBY AGREE AS FOLLOWS:

1. American shall be deemed to have an allowed secured Mechanic's Lien Claim in the amount of \$188,087.09 (the "Allowed Claim");

2. Conditioned upon bankruptcy court approval of this Stipulation and pursuant to this Stipulation, American consents to the payment of \$160,000 ("Discounted Payment") on account of the Allowed Claim.

3. The Debtor hereby waives the right to object to, or otherwise dispute, the Allowed Claim.

1 4. The Debtor shall file a motion with the Court to obtain authority to pay the
2 Discounted Payment.

3 5. Upon receipt of the foregoing Discounted Payment, any remaining unpaid balance
4 which may be due and owing to American shall be deemed to be waived, forgiven and of no further
5 force of effect.

6 **IT IS SO STIPULATED.**


7 DATED: May 4, 2022

LEVENE, NEALE, BENDER, YOO
& GOLUBCHIK L.L.P.

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9 By: /s/ David B. Golubchik
10 DAVID B. GOLUBCHIK
11 TODD M. ARNOLD
Attorneys for Debtor and Debtor in Possession

12 DATED: May 4, 2022

SHULMAN BASTIAN FRIEDMAN & BUI LLP

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14 By: 
15 RYAN O'DEA
16 Attorneys for American Truck & Tool Rentals Inc.
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 2818 La Cienega Avenue, Los Angeles, CA 90034

A true and correct copy of the foregoing document entitled **STIPULATION WITH AMERICAN TRUCK & TOOL RENTALS INC. RE: ALLOWANCE AND PAYMENT OF CLAIM** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **May 5, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Kyra E Andrassy kandrassy@swelawfirm.com, lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- Todd M Arnold tma@lnbyg.com
- Jerrold L Bregman jlbregman@bg.law, ecf@bg.law
- Marguerite Lee DeVoll mdevoll@watttieder.com, zabrams@watttieder.com
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- Genevieve G Weiner gweiner@sidley.com, laefilingnotice@sidley.com;genevieve-weiner-0813@ecf.pacerpro.com
- Jessica Wellington jwellington@bg.law, ecf@bg.law

1 **2. SERVED BY UNITED STATES MAIL:** On **May 5, 2022**, I served the following persons and/or entities
2 at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and
3 correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and
addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be
completed no later than 24 hours after the document is filed.

4 ☒ *Service information continued on attached page*

5 **3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR**
6 **EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR,
on **May 5, 2022**, I served the following persons and/or entities by personal delivery, overnight mail
7 service, or (for those who consented in writing to such service method), by facsimile transmission and/or
email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight
mail to, the judge will be completed no later than 24 hours after the document is filed.

8 ☐ *Service information continued on attached page*

9 I declare under penalty of perjury under the laws of the United States of America that the foregoing is
10 true and correct.

11 May 5, 2022
Date

Lourdes Cruz
Type Name

/s/ Lourdes Cruz
Signature

In re Crestlloyd, LLC
RSN + Secured Creditors
File No. 9562

County of Los Angeles
(MRCA-Brush Fire Clear'g Dist #1)
200 North Main Street, 16th Fl
Los Angeles, CA 90012

County of Los Angeles
(Wildlife Corridor and Open Space
Protection)
c/o SCI Consulting Group
4745 Mangels Blvd.
Fairfield, CA 94534

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Quebec J8E 1E2, Canada

County of Los Angeles
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and Open Space Measure)
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Fairfield, CA 94534

Rolls Scaffold, Inc.
Michael Rolls, CEO
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Ventura, CA 93004

American Truck & Tool Rentals
Inc./American Rentals
c/o Caprenos Inc., Cindee Wood,
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San Diego, CA 92123

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Las Vegas, NV 89131

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Guadalupe Gomez, President
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San Fernando, CA 91340

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Jeffrey D. Kapelman, CEO
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New York, NY 10001

J&E Texture, Inc.
Francisco Gonzalez, CEO
181 Exter Way
Corona, CA 92882

City of Los Angeles
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City Hall East, Suite 800
Los Angeles, CA 90012

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Raleigh, NC 27609

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Services, Inc.
Yosi Hesica, CEO
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Van Nuys, CA 91405

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Robert L. Kennedy, Jr., CEO
21366 Placerita Canyon Rd.
Newhall, CA 91321

Parquet By Dian
Dima Efros, CEO
16601 S. Main St.
Gardena, CA 90248

Powertek Electric, Inc.
Mike Moshrefi, CEO
28364 S. Western Ave. #414
Rancho Palos Verdes, CA 90275

County of Los Angeles (Wildlife Corridor
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& Conservation Authority
5750 Ramirez Canyon Road
Malibu, CA 90265

County of Los Angeles
(Local Fire Prevention, Water Quality
and Open Space Measure)
Conejo Recreation and Park District
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BMC West LLC
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Robert L. Kennedy, Jr., CEO
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Santa Clarita, CA 91350

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